

UNITED STATES DISTRICT COURT
FOR THE
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

United States Courts
Southern District of Texas
FILED

DEC 15 2011



UNITED STATES OF AMERICA
Plaintiff,

v.

\$40,051.00 IN U.S. CURRENCY
Defendant in rem

§
§
§
§
§
§
§

CIVIL ACTION NO. 4: 11-CV-03985

VERIFIED STATEMENT OF CLAIM FOR \$40,051 IN U.S. CURRENCY.

NOW COMES **Ijeoma Jane Goredema**, Claimant and owner of the Defendant in rem in the above-entitled and numbered cause, and files this Verified Statement of Claim and requesting a return to her the sum of \$40,051.00 in U.S. currency Defendant in rem in this case, and shows the Court:

DEFENDANT IN REM

1. Defendant in rem in this case is the sum of \$40,051.00 in U.S. currency, the property of Claimant **Ijeoma Jane Goredema**, which is the specific property regarding to which the Claimant, **Ijeoma Jane Goredema**, files this claim.

CLAIMANT'S INTEREST IN THE DEFENDANT IN REM

2. The Claimant, **Ijeoma Jane Goredema**, is the owner of the Respondent in rem in this case, the sum of \$40,051.00 in U.S. currency.

3. The Defendant in rem in this case, \$40,051.00 in U.S. currency, belonged to Claimant **Ijeoma Jane Goredema** as part of the Claimant's savings.

4. Claimant **Ijeoma Jane Goredema** withdrew the Defendant in rem, the sum of \$40,051.00 in U.S. currency, from the Claimant's savings, and Claimant set the money aside specifically for the purpose of using the money in transacting business in Nigeria.

5. United States Customs and Border Protection Officer Charlesworth Clarke seized the Defendant in rem, \$40,051.00 in U.S. currency from **Ijeoma Jane Goredema**, at the George Bush Intercontinental Airport on September 23, 2011.

6. Claimant **Ijeoma Jane Goredema** made it clear that she planned to declare the Defendant in rem, the sum of \$40,051 to the authorities during conversations with Officer Charlesworth Clarke and before Officer Clarke ordered the Claimant to a table where the Officer searched the Claimant's property and seized the money from the Claimant.

7. The Claimant **Ijeoma Jane Goredema** has attached a separate affidavit as part of her Claim to the Defendant in rem, the sum of \$40,051.00 in U.S. currency. The affidavit is hereby attached as 'Exhibit A.'

8. The Claimant as the rightful owner hereby request that the Defendant in rem in this case, the sum of \$40,051, be returned to the Claimant.

WHEREFORE Claimant **Ijeoma Jane Goredema** prays that the Respondent in rem, the sum of **\$40,051.00 in U.S. currency** be returned to the Claimant, **Ijeoma Jane Goredema**, the Respondent in rem \$40,051.00 being the property of Claimant **Ijeoma Jane Goredema**.

ATTESTATION AND OATH

I, **Ijeoma Jane Goredema**, hereby declare *under penalty of perjury* that the information provided in support of my claim is true and correct to the best of my knowledge and belief.

Signature: _____

Ijeoma Jane Goredema

12/13/2011

Date

"Affiant Sayeth Not"

Ijeoma Jane Goredema

SWORN and SUBSCRIBED before me this 13 day of December 2011.

Glenis Michele Sampson
Notary Public, State of Texas

(SEAL)

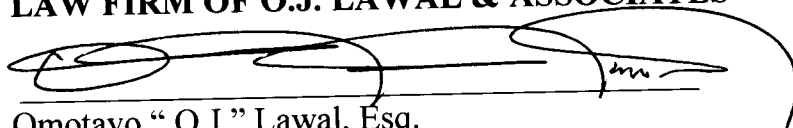


My commission expires _____

9/6/2015

Respectfully submitted,

LAW FIRM OF O.J. LAWAL & ASSOCIATES



Omotayo "O.J." Lawal, Esq.

TBN : 24004144

8700 Commerce Park, Ste 202

Houston, Texas 77036

Phone : 713-773-0600

Fax : 713-773-0699

ATTORNEY FOR CLAIMANT

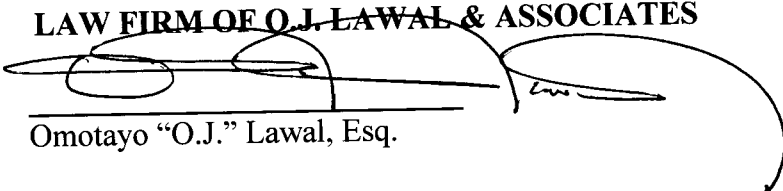
IJEOMA JANE GOREDEMA

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on 13th of December, 2011, a true and correct copy of the forgoing Verified Statement of Claim forwarded to Assistant U.S. Attorney Albert Ratliff, United States Attorney's Office, P.O. Box 61129, Houston, Texas 77208, via certified mail, return receipt requested.

Respectfully submitted,

LAW FIRM OF O.J. LAWAL & ASSOCIATES



Omotayo "O.J." Lawal, Esq.

**AFFIDAVIT IN SUPPORT OF CLAIM TO \$40,051.00 IN U.S. CURRENCY
PROPERTY OF IJEOMA JANE GOREDEMA**

STATE OF TEXAS

COUNTY OF HARRIS

BEFORE ME, the undersigned notary public appeared **Ijeoma Jane Goredema**, to me to be the person whose name is subscribed below and who being by me duly sworn, deposed and stated:

My name is **Ijeoma Jane Goredema**(nee Amadi). I am over the age of twenty one and of sound mind. I am fully competent in all respect to make this Affidavit, having personal knowledge of the facts stated herein and state all these facts are true and correct.

1. I am United States Citizen residing at 17111 Shadow Ledge Drive, Houston, Texas 77095.
2. I am a divorced mother of three children aged 15, 10 and 5 respectively.
3. I am a law abiding citizen of the United States.
4. I work as a Healthcare Administrator with All American Home Healthcare, Inc. based in Houston, Texas.
5. I am also the owner of Newijay Health Services based in Houston, Texas.
6. As part of my plans to travel to Nigeria in September 2011, I had set aside some money from my savings.
7. On September 23rd, 2011, I was at the George Bush International Airport in Houston Texas with the aim of boarding a KLM Airlines flight to Nigeria en route Amsterdam.
8. At the airport, I was accosted by a United States Border and Customs Officer who asked me if I was travelling with other family members. I answered that I was the only one travelling.
9. The Officer, who I later know to be Officer Charlesworth Clarke, then asked me if I was transporting more than ten thousand Dollars (\$10,000.00). I responded that I had on me about forty thousand Dollars (\$40,000.00)

10. Officer Clarke then took a form, and filled the form. As he was filling out the form, Officer Clarke was talking to me at the same time, and I was trying to pay attention to the instruction he was giving to me.

11. After he filled out the form, Officer Clarke then ordered that I should follow him to a table, and I obeyed him.

12. At the table, I told Officer Clarke and the other Officer that some of the money I was carrying was on my person and that I needed privacy to remove the money. An Officer escorted me to the place where I removed some of the money. As I was handing the Officers the \$4,000.00 that I had on me, **Officer Clarke** and other Officers started searching my purse, my carryon bags and my my wallet.

13. At no time did Officer Clarke or any other officer asked if I wanted to unload the content including the money inside of my carryon bags or my wallets by myself. If they asked, I would have put everything I had in the bags and the wallets on their table or given them the money inside my bags and wallets to them, just as I did with the money I had on me.

14. At no time did Officer Clarke or any other Officer asked me if I they should help me in unloading the contents of my bags or wallets. If they had asked, I would have gladly told them that they should go ahead and check the inside of my bags and my wallets if they wanted to. But, they never asked.

15. After unloading all the property including the money in my bags and my wallet, the Officers patted down my person. After patting me down, they removed the sum of one (1) Dollar from my **front/back** pocket.

16. The Officers then counted all the money they have taken from my bags, my wallet and my person, and it totaled \$40,051.00.

17. After counting the money, the Officers then told me they were going to seize my money.

18. I was surprised to hear that they were going to seize my money, as I do not believe I had done anything wrong to warrant the seizure of my money. If I had to declare the amount, I was of the thinking that this will happen when I am onboard the aircraft and before I land in my destination.

19. When I withdrew the money from my savings, I planned to use the \$40,051.00 for business in Nigeria, and make some profit from it, so I can take care of my kids as a single mother.

20. I need the money. As a single mother I need the \$40,051.00 that was seized from me by the Officers as stated above so I can take care of my kids. The money belongs to me and is my property.

21. I therefore request that my \$40,051.00 be returned to me since it is my property.

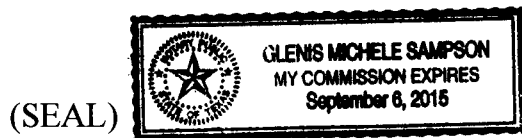
22. That I, **Ijeoma Jane Goredema**, hereby declare *under penalty of perjury* that the information provided in this affidavit in support of my claim to my \$40,05. 00 in U.S. currency that was seized from me on September 23rd, 2011 at George Bush Intercontinental Airport, Houston, Texas, is true and correct to the best of my knowledge and belief.

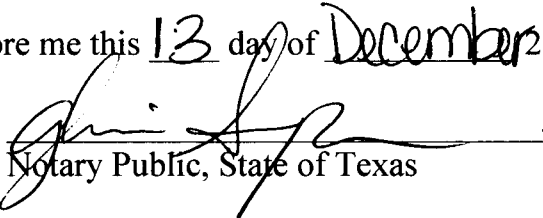
"Affiant Sayeth Not"



Ijeoma Jane Goredema

SWORN and SUBSCRIBED before me this 13 day of December 2011.





Notary Public, State of Texas

My commission expires 9/6/2015

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on 13th of December, 2011, a true and correct copy of the forgoing Affidavit in Support of Claim to \$40,051.00 in U.S. Currency Property of Ijeoma Jane Gorema was forwarded to Assistant U.S. Attorney Albert Ratliff, United States Attorney's Office, P.O. Box 61129, Houston, Texas 77028, via certified mail, return receipt requested.

Respectfully submitted,

LAW FIRM OF O.J. LAVAL & ASSOCIATES

A handwritten signature in black ink, consisting of a large, stylized 'O' followed by a series of loops and a horizontal line extending to the right.

Omotayo "O.J." Lawal, Esq.

J